

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
Squirrels Research Labs LLC, <i>et al.</i> <sup>1</sup>	)	Case No. 21- 61491
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Judge Tiiara N.A. Patton
	)	

**MOTION OF SQUIRRELS RESEARCH LABS LLC AND THE MIDWEST DATA  
COMPANY LLC TO LIMIT SERVICE OF THEIR REPLY IN SUPPORT OF THEIR  
MOTION FOR ENTRY OF AN ORDER APPROVING COMPROMISE AND  
SETTLEMENT WITH CINCINNATI INSURANCE COMPANY**

Squirrels Research Labs LLC (“SQRL”) and The Midwest Data Company LLC (“MWDC”, collectively with SQRL, the “Debtors”), by and through undersigned counsel, hereby move the Court to limit service of their Reply (the “Reply”) in Support of Motion of Squirrels Research Labs LLC and The Midwest Data Company for the Entry of an Order Approving Compromise and Settlement with Cincinnati Insurance Company filed contemporaneously herewith. In support of this Motion, the Debtors respectfully state the following:

1. The Motion to Compromise was filed on April 9, 2024 and served on all creditors and parties in interest, as set forth on the certificate of service, along with a Notice of the deadline to object and the date of a hearing on the Motion to Compromise [Docket ## 323, 326].

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<sup>1</sup> The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

2. The objection deadline passed on May 2, 2024. The only objection filed is that of Second Foundation Mining LLC by and through the CEO, Robert Oxsen, of Second Foundation Mining LLC. No other objections have been filed with the Court.

3. The list of all creditors and parties in interest is extensive, and includes entities and individuals in foreign jurisdictions. Mailing a copy of the Reply to all of those creditors and parties in interest would be expensive and burdensome to the estate. The Debtors submit that cause exists to limit notice of the Reply to (1) Second Foundation Mining LLC, by email to [sfmining@protonmail.com](mailto:sfmining@protonmail.com), and (2) all parties listed on the Court's Electronic Mail Notice List, including the United States Trustee. The Debtors believe limiting service of the Reply to these parties is appropriate and adequate service and provides fair and reasonable notice.

WHEREFORE, the Debtors respectfully request the Court enter an Order substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: May 3, 2024

Respectfully submitted,

/s/ Julie K. Zurn

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## CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2024, a true and correct copy of the Motion of Squirrels Research Labs LLC and the Midwest Data Company LLC to Limit Service of Their Reply In Support of Their Motion for Entry of an Order Approving Compromise and Settlement With Cincinnati Insurance Company, was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

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